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May 17, 2022

National Freedom of Information Officer
U.S. EPA, Records, FOIA and Privacy Branch
1200 Pennsylvania Avenue, N.W. (2822T)
Washington, D.C. 20460

Re: Freedom of Information Act Request

Dear Sir or Madam:

Pursuant to the Freedom of Information Act (FOIA), as amended, 5 U.S.C. §§ 552, *et seq.*, and the U.S. Environmental Protection Agency's (EPA) rules issued thereunder, 40 C.F.R. Part 2, COGENCY GLOBAL INC., hereby requests from EPA copies of:

- Any records relating to requests for corrections to the Toxic Substances Control Act (TSCA) Chemical Substance Inventory (Inventory) (exclusive of the actual request itself) submitted to EPA since 2000, including but not limited to the dates of such request, internal EPA case number, the date of EPA's response to such request, and the final outcome of the request (grant or denial), and any releasable information regarding the submitter, the Chemical Abstracts Service Registry Number (CAS RN) or accession number of the original substance identity, and the CAS RN or accession number of the updated substance identity;
- Any readily available lists or summaries of TSCA Inventory correction requests and their outcomes;
- Any document relating to the promulgation, renewal, or implementation of EPA's guidelines for "Corrections to Previous Inventory Reporting Forms," 45 Fed. Reg. 50544 (July 29, 1980) (1980 Guidelines);
- Any document relating to EPA's notice, "Revocation of 1980 Guidelines and Final Opportunity To Submit a Request To Correct the Initial Report Filed for the Original Toxic Substances Control Act (TSCA) Inventory of Chemical Substances," 87 Fed. Reg. 10781 (Feb. 25, 2022) (Revocation Notice), including records that state or explain EPA's decision or legal position regarding corrections to the TSCA Inventory; and
- Any factual information referenced or relied upon in EPA's Revocation Notice.

These documents would include letters, e-mails, facsimiles, telephone conversation logs, notes, meeting minutes or summaries of any meetings with EPA, memoranda, comments, presentations, petitions, and related written materials.

Documents responsive to this request likely will be maintained by EPA's Office of Pollution Prevention and Toxics (OPPT) and Office of Mission Support. These offices are identified solely

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to assist EPA in responding to this request and is not intended to limit the scope of this request in any way. Documents responsive to this request may be maintained by other EPA offices and divisions, and any such documents expressly are included within the scope of this request.

COGENCY GLOBAL INC. understands that some of the documents responsive to this request may have to undergo confidential business information (CBI) review. COGENCY GLOBAL INC. requests that any responsive documents that do not have to undergo CBI review be provided to us as soon as possible.

If for any reason you determine that portions of the requested information are exempt from disclosure under FOIA, please delete the allegedly exempt material, inform us of the basis for the claimed exemption, and furnish us with copies of those portions of the information that you determine not to be exempt. COGENCY GLOBAL INC. consents to such deletion at this time to facilitate your prompt response and in no way waives our right to appeal any determination that you may make regarding the applicability of any FOIA exemptions to the requested documents and information.

COGENCY GLOBAL INC. requests that you provide us with accurate copies or a complete and accurate account of the information requested. This is a commercial request. COGENCY GLOBAL INC. agrees to pay reasonable search and reproduction costs; if these costs exceed \$200, however, COGENCY GLOBAL INC. requests that you notify us before reproducing the documents.

COGENCY GLOBAL INC. understands that it can expect a response within 20 days of your receipt of this letter. We prefer electronic copies of the documents, but if courier or overnight delivery is necessary, please contact us for delivery or pickup information.

If you have any questions about this request or require further information, please contact us at 800.494.5225 or agency@cocencyglobal.com. Thank you for your attention to this matter.

Sincerely,

Andrew Hackett

Andrew Hackett, Vice President
On behalf of:
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